

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Pentrate Metal Processing, Inc.		
Project Address: 3517 East Olympic Blvd.	City: Los Angeles	County: Los Angeles
Approval Action Under Consideration by DTSC:		
<input type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-issuance
<input checked="" type="checkbox"/> Corrective Measure Study/Statement of Basis	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input type="checkbox"/> Other (specify):		
Statutory Authority:		
<input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		

Project Description: The project involves the approval of the Corrective Measures Proposal (CMP) for volatile organic compounds (VOCs) in soil at the Pentrate Metal Processing facility (Site). The CMP summarizes the results of previous site characterization performed at the Site and details the proposed remedial activities to address contamination detected in Site soils: installation of soil vapor extraction (SVE) wells, vapor extraction piping, and vapor extraction unit (positive displacement blower).

Background: The Site is located in the city of Los Angeles at 3501-3517 East Olympic Boulevard and occupies approximately 24,360 square feet and consists of six industrial type buildings built in sections between 1928 and 1956. The Site is bordered by residential uses beyond an alley to the north and a mix of commercial and industrial uses to the west, south, and east.

The southwest corner of the Site was utilized as a gasoline service station from 1928 to 1939. Various manufacturing businesses occupied the Site from 1939 to 1966. Other past commercial activities on the Site included retail sales, a restaurant, oil storage, metal fabrication and processing, auto repair, machine shop, paint spraying, a quilt shop, electroplating, warehousing, and a job training school.

Pentrate Metal Processing has occupied the Site since 1966 and operates a metal processing facility which performs phosphating, passivating, and black oxidizing of metal products. Activities such as acid pickling and alkaline cleaning of metal also occur at the Site. The Site formerly had a trichloroethylene (TCE) above ground storage tank located in the degreaser area at the north-central portion of the building and TCE storage immediately west of the oven in the eastern portion of the building.

Several soil and soil gas sampling activities have been conducted at the Site over the past two years. Previous investigations found elevated levels of VOCs, including chlorinated solvents, in subsurface vapors at the Site. Specific chemicals found exceeding regulatory action levels, DTSC screening levels (SL) or U.S. Environmental Protection Agency (EPA) regional screening levels (RSL), include:

- Benzene (SL and RSL action level of 0.42 micrograms per liter (ug/L))
- Carbon tetrachloride (SL and RSL action level of 2.0 ug/L)
- Chloroform (RSL action level of 0.53 ug/L)
- Dichloroethane (RSL action level of 7.7 ug/L)
- Tetrachloroethene (SL and RSL action level of 2.0 ug/L)
- Trichloroethane (RSL action level of 0.77 ug/L)
- Trichloroethylene (SL and RSL action level of 3.0 ug/L)

In December 2018, a pilot test for the effectiveness of SVE for the Site was conducted and concluded that SVE would be effective in reducing VOCs in the subsurface and clarified the methodology of SVE well placement.

Pentrate Metal Processing, Inc. and DTSC entered into a Corrective Action Consent Agreement (HWCA-FY16/17-006) to prepare a Corrective Measures Study if contaminant concentrations exceed human health-based or ecologically-based action levels or if DTSC determines the contaminant releases pose a potential threat to human health or the environment.

Project Activities: Based on results of the vapor extraction effectiveness testing, the corrective measures proposed for the Site involve construction and operation of a soil vapor extraction treatment system (VES) for the entire Site and recordation of a Land Use Covenant to limit the site for industrial/commercial uses. Components of the VES include:

1. **Vapor Extraction Wells:** A total of six (6) soil vapor extraction wells (VE1, VE3, VE4, VE6-VE8) will be installed. Wells VE2 and VE5 were installed as part of the soil vapor extraction pilot test in 2018. Each new well, except VE1, will be installed inside the existing buildings. Well VE1 will be installed in the existing outdoor parking lot which is blocked by existing buildings towards nearby residences. The depths of the new wells will be 25 feet but may be extended deeper if field observations warrant. The screen intervals for the new wells will be placed at between 5 and 12 feet below ground surface (bgs) and also between 19 and 25 feet bgs.
2. **Vapor Extraction Piping and Unit:** Vapor extraction piping will be installed above grade, if practical, and will connect SVE wells to a proposed treatment system compound at the Site (located on the western side of the buildings in the parking lot). Polyvinyl chloride (PVC) piping from each well will be installed up a support column of the buildings and then run along the upper part of the buildings to the treatment system compound. Should aboveground piping impede current site operations, piping will be installed below ground. Vapor extraction piping will be constructed of minimum 2-inch diameter Schedule 40 PVC.

An SVE unit equipped with a 40-gallon knockout pot and two (2) 1,000- or 2,000-pound vapor-phase granular activated carbon (GAC) vessels in series will be installed at the Site. The SVE unit will consist of a 250 standard cubic feet per minute (scfm) rated, positive displacement blower driven by a 10-horsepower motor. The following additional components are proposed for the SVE unit:

- Aboveground poly storage tank for storage of knockout pot water;
- Valves, gauges, hosing, and sample ports;
- Control panels and instrumentation; and
- Meters and gauges for system operation data.

The SVE unit will extract vapors from the six new wells and is permitted to operate under a Various Locations Permit issued by the South Coast Air Quality Management District (SCAQMD). Remediation system start-up will be performed in accordance with SCAQMD requirements. The proposed system can run unattended but will require periodic site visits to record system operation data and to maintain and adjust the system to operate efficiently and in compliance with SCAQMD requirements.

It is anticipated that permitting, SVE pipe installation, remediation compound construction, and installation of SVE wells will require approximately 3 months. The VES will operate for approximately one year then re-start briefly approximately two weeks after the one-year operation period to assess for and remove any "rebound" VOC concentrations. Though the VES is planned to operate for one year in order to meet cleanup objectives (to remediate the Site by removing soil vapor to the appropriate regulatory action level or a proposed target cleanup level), a decision to terminate operation of the VES will be based on its performance and the satisfactory reduction of VOCs in soil and soil vapor. As such, DTSC approval is required prior to shutting down of the VES.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: MK Environmental Consulting, Inc., on behalf of Pentrate Metal Processing, Inc.

Exempt Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- Categorical Exemption: [CCR Title 14, Sec. 15330]
- Statutory Exemptions: [State Code Section Number]
- Common Sense Exemption [CCR, Sec. 15061(b)(3)]

Exemption Title: Minor Actions Taken to Prevent, Minimize, Mitigate or Eliminate the Release or Threat of Release of a Hazardous Waste or Hazardous Substances.

Reasons Why Project is Exempt:

1. The project is a minor action designed to prevent, minimize, stabilize, mitigate or eliminate the release or threat of release of hazardous waste or hazardous substances.
2. The project will not exceed \$1 million in cost.
3. The project will be consistent with applicable State and local environmental permitting requirements including permit to operate under a Various Locations Permit from SCAQMD.
4. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit.
5. The project does not involve the relocation of residences or businesses.
6. The project does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123. The project is a small scaled in-situ soil vapor extraction and treatment system which is permitted by the SCAQMD.
7. The exceptions pursuant to California Code Regulations, Title 14 § 15300.2 have been addressed as follows:
 - a. Cumulative Impact. The project will not result in cumulative impacts because it is designed to be a short-term final remedy that would not lead to a succession of projects of the same type in the same place over time.
 - b. Significant Effect. The project does not involve any unusual circumstances so that there is no possibility that the project will have a significant effect on the environment.
 - c. Scenic Highways. The project will not damage scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, because it is not located within view of a highway officially designated as a state scenic highway.
 - d. Hazardous Waste Sites. The project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
 - e. Historical Resources. The project will not cause the substantial adverse change in the significance of an historical resource at the Site because there are none at the Site.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control
 File Room
 Site Mitigation and Restoration Program
 5796 Corporate Avenue
 Cypress, CA 90630

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002439

Johnson Abraham Project Manager	Environmental Scientist Title	(714) 484-5380 Phone No.
 Branch Chief's Signature		6-30-20 Date
Javier Hinojosa Branch Chief	Environmental Program Manager I Title	(714) 484-5484 Phone No.

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: